

EXHIBIT O

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION

Civil No.
19-2875

(RBK/JS)

THIS DOCUMENT APPLIES TO ALL
CASES

HON ROBERT B.
KUGLER

- CONFIDENTIAL INFORMATION -
SUBJECT TO PROTECTIVE ORDER

Remote Videotaped via Zoom

Deposition of JIE WANG, commencing at 7:01

a.m. China Standard Time, on the 18th of May,

2021, before Maureen O'Connor Pollard,

Registered Diplomate Reporter, Realtime

Systems Administrator, Certified Shorthand

Reporter.

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1 reviewed?

2 A. That's correct.

3 Q. And how long have you had that
4 laptop?

5 A. Approximately three years.
6 Could be a little longer.

7 Q. What type of laptop is it?

8 A. It's a Microsoft Surface.

9 Q. And prior to that laptop, were
10 you issued a laptop before that by ZHP?

11 A. Yes. There was the one prior
12 to that.

13 Q. Okay. And so prior to the
14 Microsoft Surface, what laptop did you have
15 at that time?

16 A. It was also a Surface.

17 Q. And do you recall how long
18 you've had that laptop?

19 A. That one was just -- that was
20 the only other one. That was the first one,
21 and then this one is the second one.

22 Q. Okay. Do you -- well, does ZHP
23 provide a cell phone for you to use for work
24 purposes?

1 A. No.

2 Q. Do you use your -- well,
3 rephrase.

4 Do you have a personal cell
5 phone?

6 A. I do.

7 Q. Do you use that for work
8 purposes?

9 A. No.

10 Q. So -- well, let me ask this
11 question.

12 What type of cell phone do you
13 currently have?

14 A. It's a smartphone.

15 Q. And what type of smartphone?

16 A. It's a Huawei -- it's a Huawei
17 phone. I can't remember exactly -- it could
18 be P20, that's the model number.

19 Q. The model number to me is not
20 important, but how long, if you know, have
21 you had that current cell phone?

22 A. About two years.

23 Q. And before that did you have
24 any other cell phones?